

Atul C. Shah, MD  
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Keith Martorana, Esq.  
Gibson, Dunn & Crutcher LLP  
Wilmington Trust Company as  
GUC Trust Administrator  
200 Park Avenue, 47th Floor  
New York, New York 10166

Ref: Response to Omnibus Reply by Atul C. Shah, MD.

Dear Keith Martorana:

Good Morning

I received the Hard Copy of the Omnibus Reply of Wilmington Trust Company as GUC Trust Administrator and Trustee from Garden City Group, LLC dated June 26, 2015.

Now, I am forwarding my "Response to Omnibus Reply" in Hard Copy and Email copy to your office, to the United States Bankruptcy Court and the Defendant Attorneys.

Please keep me informed of the future updates of this civil case.

Sincerely,

Atul C. Shah, MD  
Pro Se Litigant  
2884 Manorwood Drive  
Troy, Michigan 48085

June 29, 2015

**Hearing Date and Time: July 01, 2015 at 9.45 a.m. (Eastern Time)**  
**Objection Deadline: June 24, 2015 at 4.00 p.m. (Eastern Time)**

Atul C. Shah, MD  
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Representing Himself (Atul C. Shah) for  
MLC GUC Claim No. 28820 filed by Atul Shah

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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|  
**In re** |  
|  
**Motors Liquidation Company, et al.,** |  
**f/k/a General Motors Corp., et al.** |  
|  
**Debtors.** |  
|  
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**RESPONSE TO THE OMNIBUS REPLY OF WILMINGTON TRUST  
COMPANY, AS GUC TRUST ADMINISTRATOR AND TRUSTEE, TO  
RESPONSES RECEIVED IN RESPECT OF THE GUC TRUST  
ADMINISTRATOR'S MOTION FOR AN ORDER GRANTING  
AUTHORITY (A) TO EXERCISE NEW GM WARRANTS AND  
LIQUIDATE NEW GM COMMON STOCK AND (B) TO MAKE  
CORRESPONDING AMENDMENTS TO THE GUC TRUST  
AGREEMENT (C) REQUESTING RELIEF SOUGHT FOR CREDITOR  
ATUL C. SHAH (D) REQUESTING THAT THIS HISTORIC CIVIL  
CASE BY ATUL C. SHAH HAS EXCELLENT MERITS**

**Introduction**

**This is a Response to the Omnibus Reply of Wilmington Trust**

**Company as GUC Trust Administrator and Trustee dated June 26,  
2015 by the Plaintiff and Pro Se Litigant Atul C. Shah, MD.**

As an introduction and here comes, Atul C. Shah, MD a Plaintiff and Pro Se Litigant against the Motor Liquidation Company et al., f/ka/a General Motors Corp., et al since December 2008.

Atul C. Shah, Petitioner v. Motor Liquidation Company GUC Trust Civil Case Number 14-830 has been docketed with the Supreme Court of the United States on January 14, 2015.

Atul C. Shah, MD has been listed as the Creditor with the Consolidated List of Creditors at the United States Bankruptcy Court since 2010.

**To: THE HONORABLE ROBERT E. GERBER  
UNITED STATES BANKRUPTCY COURT JUDGE**

Atul C. Shah, MD as the Plaintiff and Pro se Litigant is forwarding Response to the Omnibus reply of Wilmington Trust Company dated June 26, 2015 to Dr. Atul Shah's Response with Objection [Docket No. 13244] (The "**Shah Response**").

Herewith, I am requesting for the following items with this Response to the Omnibus Reply of Wilmington Trust Company as GUC TRUST Administrator dated June 26, 2015.

**A. Request for Relief Sought:**

Now, I am requesting Honorable Court for the Relief up to Ten Million Plus Dollars as repetitively requested in my Reply and Response Legal Briefs to three Federal Courts including United States Bankruptcy Court as well to the Supreme Court of the United States from 2012 to 2015.

**B. This historic Civil Case has Excellent Merits:**

This historic and unprecedeted Civil Case has National and International Significance with Extraordinary Implementations for the betterment of the Modern Mankind as repetitively mentioned to the three Federal Courts and the Supreme Court of the United States from 2012 to 2015 Legal Briefs and superb articles written by this humble self name as Atul C. Shah, MD or Dr. Shah with this case.

**C. Request for Relief Sought and excellent Merits:**

I am requesting for the Relief up to Ten Million plus Dollars that is permissible and compatible with the Modern law System and

American Judiciary System as well as American Constitutional Amendments including United States Bankruptcy Court rules.

Also, this historic and unprecedeted Civil Case has Excellent Merits and Credibility per the Standard of the American Judiciary System and Constitutional Amendments and the Applicable Laws.

**D. Humble Request:**

I am humbly requesting to the Honorable Bankruptcy Judge Robert E. Gerber that I am seeking Relief up to **Ten Million plus Dollars.** Also, this historic Civil Case has the **Excellent Merits** As well as **National and International Significance with Extraordinary Implementations** for the betterment of Modern Mankind in USA, India and other countries.

This is a simple and humble **Response to the Omnibus Reply** of Wilmington Trust Company as GUC Trust Administrator and Trustee dated June 26, 2015 by the Plaintiff Atul C. Shah, MD.

**Conclusion**

I, Atul C. Shah, respectfully requesting the Honorable United States Bankruptcy Court for seeking Relief up to Ten Million plus Dollars and consider having Excellent Merits with this historical and unprecedented Civil Case.

Respectfully submitted,

Atul C. Shah  
Pro Se Litigant  
2884 Manorwood Drive  
Troy, Michigan  
June 29, 2015

**Hard Copy and Email Copy forwarded to following Recipients:**

1. Honorable Judge Robert E. Gerber at USBC, New York
2. Keith Martorana at Gibson, Dunn & Crutcher LLP, New York
3. Joseph H. Smolinsky Esq. at Weil, Gotshal & Mendes, LLP, New York
4. Jeffrey Rhodes, Esq. Defendant Attorney Dickstein Shapiro, Washington D.C.
5. Colleen Kilfoyle, Esq. Associate Defendant Attorney at Dickstein Shapiro, LLP in New York

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Matthew J. Williams  
Lisa H. Rubin  
Keith R. Martorana

*Attorneys for the Motors Liquidation Company  
GUC Trust Administrator*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.  
MOTORS LIQUIDATION COMPANY, *et al.* : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* : (Jointly Administered)  
Debtors. :  
-----X

**OMNIBUS REPLY OF WILMINGTON TRUST COMPANY, AS GUC TRUST  
ADMINISTRATOR AND TRUSTEE, TO RESPONSES RECEIVED  
IN RESPECT OF THE GUC TRUST ADMINISTRATOR'S MOTION FOR AN  
ORDER GRANTING AUTHORITY (A) TO EXERCISE NEW GM WARRANTS  
AND LIQUIDATE NEW GM COMMON STOCK AND (B) TO MAKE  
CORRESPONDING AMENDMENTS TO THE GUC TRUST AGREEMENT**